

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JEFFREY SIEGEL, Administrator of the
Estate of MOUSTAPHA AKKAD,
Deceased, SOOHA AKKAD, individually;
SUSAN GITELSON, Special Administrator
of the Estate of RIMA AKKAD MONLA,
deceased; and
MICHAEL BUTLER,

Plaintiffs,

v.

H GROUP HOLDING, INC., a corporation;
GLOBAL HYATT CORPORATION, a
corporation;
HYATT INTERNATIONAL
CORPORATION, a corporation;
HYATT CORPORATION, a corporation;
HYATT HOTELS CORPORATION, a
corporation; HYATT INTERNATIONAL
(EUROPE AFRICA MIDDLE EAST) LLC;
AIC HOLDING CO., a corporation;
HYATT INTERNATIONAL HOLDINGS,
CO., a corporation; HI HOLDINGS
LUXEMBOURG S.a.r.l.; ZARA
INVESTMENT HOLDING CO.; and
AMMAN TOURISM INVESTMENT CO.,
LTD.,

Defendants.

No. 07 C 6830

Judge John W. Darrah

Magistrate Judge Susan E. Cox

AFFIDAVIT OF MARY TURILLI
IN SUPPORT OF DEFENDANTS AIC HOLDING CO. AND
HYATT INTERNATIONAL HOLDING CO.'S MOTION TO DISMISS

Mary Turilli, being duly sworn, deposes and states as follows:

1. I am currently a Vice President of Hyatt Hotels Corporation ("Hyatt Hotels"), an indirect subsidiary of Global Hyatt Corporation ("Global Hyatt"). My current role is in the Real

Estate and Development Group of Global Hyatt in the Corporate Transactions Group. My duties require extensive familiarity with the corporate structure of Global Hyatt and its subsidiaries, and with the Management Agreements between various Hyatt subsidiaries and owners of hotels that operate under the "Hyatt" name. I have been in my current role since September 2007. Prior to September 2007, my title was Director of Legal Services and Compliance, Legal Department, a position that I served in for about two years. My primary responsibility as Director was oversight of the corporate records of Global Hyatt and its subsidiaries. In total, I have been an employee of subsidiaries of Global Hyatt for over twenty-five years. Throughout those years, I have served in a variety of roles that have caused me to be familiar with the corporate structure of Global Hyatt and its subsidiaries. Accordingly, I have personal knowledge of the matters set forth in the Affidavit. I am competent to testify completely and accurately as to all such matters if called as a witness.

2. Hyatt International Corporation ("Hyatt International") is a Delaware corporation with its address at 71 South Wacker Drive, Chicago, Illinois 60606.

3. AIC Holding Co. ("AIC") is a Delaware corporation with its address at 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808. It is not registered to do business in Illinois, nor does it have an agent for service of process in the state.

4. Hyatt International Holdings Co. ("HI Holdings") is a Delaware corporation with its address at 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808. HI Holdings maintains no offices, has no employees, and owns no real property or bank accounts in Illinois. It is not registered to do business in Illinois, nor does it have an agent for service of process in the state. HI Holdings has not advertised, solicited business, or transacted any business in Illinois.

5. Hyatt International (Europe Africa Middle East) LLC ("Hyatt EAME") is a company organized in and having its principal place of business in Switzerland.

6. HI Holdings Luxembourg S.a.r.l. ("HIH Luxembourg") is a company organized and having its principal place of business in Luxembourg.

7. On November 9, 2005, there were four (4) tiers of entities between AIC and Hyatt EAME, three (3) tiers of corporate entities between Hyatt International and Hyatt EAME, and two (2) tiers of corporate entities between HI Holdings and Hyatt EAME. AIC was the parent company of Hyatt International. Hyatt International was the parent company of HI Holdings. HI Holdings was the parent company of HIH Luxembourg. HIH Luxembourg owned all of the interest in Hyatt EAME.

8. AIC is strictly a holding company that owns stock in Hyatt International. AIC does not arrange financing for or ongoing capitalization of its subsidiary. It does not guarantee Hyatt International's financial obligations. AIC does not participate in any of the day-to-day operations of its subsidiary. It does not own, operate, or manage any hotels.

9. HI Holdings is strictly a holding company that owns stock in one Delaware and several foreign companies, including HIH Luxembourg. HI Holdings does not arrange financing for or ongoing capitalization of HIH Luxembourg or Hyatt EAME. It does not guarantee any of HIH Luxembourg's or Hyatt EAME's financial obligations. HI Holdings does not participate in any of the day-to-day operations of HIH Luxembourg or Hyatt EAME. HI Holdings does not own, operate, or manage any hotels.

10. Hyatt EAME observes all formal legal requirements of a Swiss company. Hyatt EAME maintains its own books and records, which it keeps at its headquarters in Switzerland.

Hyatt EAME's, HI Holdings's, and HHH Luxembourg's books and records kept entirely separate and are maintained in different countries.


11. HI Holdings, HHH Luxembourg, and Hyatt EAME are governed by separate Boards of Directors (or, in the case of Hyatt EAME, a Board of Managers). The Boards of Directors of HI Holdings and HHH Luxembourg and the Board of Managers of Hyatt EAME conduct their meetings separately, at different times and locations.

12. HI Holdings, HHH Luxembourg, and Hyatt EAME each maintain separate bank accounts. Hyatt EAME does not co-mingle its funds with those of HI Holdings or HHH Luxembourg. Hyatt EAME's assets are more than sufficient to satisfy any potential adverse judgment in this case.

13. Most of Hyatt EAME's business is with companies other than HI Holdings and HHH Luxembourg. For example, much of Hyatt EAME's business is with individual hotel owners, such as Amman Tourism. Hyatt EAME has executed a number of management agreements with hotels in Europe, Africa, and the Middle East.

FURTHER AFFIANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct.


Mary Turilli

Executed on: 6 February 2008